

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Valerie Rodich-Annese, individually and on  
behalf of all others similarly situated vs.  
Zhejiang Huahai Pharmaceutical Co., Ltd.,  
et al.* Case No. 1:19-cv-07161-RBK-JS

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF VALARIE RODICH-ANNESE**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Valerie Rodich-Annese on March 9, 2021 at 9:00 a.m. EST at 105 Hawthorne St., Pittsburgh, PA 15218. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Ethan R. Feldman  
CIPRIANI & WERNER, P.C.  
450 Sentry Parkway East  
Suite 200  
Blue Bell, PA 19422  
(610) 567-0700  
efeldman@c-wlaw.com

Date: February 10, 2021

Respectfully submitted,

s/ *Ethan Feldman*  
Ethan R. Feldman  
CIPRIANI & WERNER, P.C.  
450 Sentry Parkway East  
Suite 200  
Blue Bell, PA 19422  
(610) 567-0700  
efeldman@c-wlaw.com

*Attorney for Defendants  
Aurobindo Pharma USA, Inc.,  
Aurobindo Pharma Ltd., and  
Aurolife Pharma LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of February, 2021 a true and correct copy of the Amended Notice of Videotaped Deposition of Plaintiff Valerie Rodich-Annese was served upon the following by e-mail, with copies to Counsel for Plaintiffs and all counsel of record by ECF:

Nick Migliaccio  
Migliaccio & Rathod LLP  
412 H St NE  
Washington, DE 20002  
(202) 470-3520  
nmigliaccio@classlawdc.com

Rachel J. Geman  
Lief Cabraser Heimann & Bernstein, LLP  
2w50 Hudson Street, 8<sup>th</sup> Floor  
New York, NY 10013-1413  
(212) 355-9500  
rgeman@lchb.com

Conlee S. Whiteley  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130  
(505) 524-5777  
c.whiteley@kanner-law.com

s/ *Ethan Feldman*  
Ethan R. Feldman